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Devin G. Nunes,)	Case No. 5:19-cv-04064-CJW-MAR
)	
Plaintiff,)	
)	
v.)	
)	Joint Unresisted Motion
Ryan Lizza and Hearst Magazine Media,)	for Entry of Protective Order
Inc.,)	
)	
Defendants.)	
)	
)	

3. Plaintiff and Defendants have agreed upon the terms of the Proposed Protective Order to provide a mechanism for the disclosing parties to designate documents, transcripts, and other discovery materials as “confidential” or “counsel’s eyes only.”

4. The Proposed Protective Order is substantively identical to the protective order entered by the Court in *NuStar Farms, LLC et al. v. Lizza et al.*, No. 5:20-cv-04003-CJW-MAR (N.D. Iowa) (“*NuStar*”), ECF No. 63 (the “*NuStar* Protective Order”), except that (i) the first paragraph of the *NuStar* Protective Order has been removed, and (ii) the last sentence of the ninth paragraph of the *NuStar* Protective Order has been removed. For the Court’s reference, the Parties will email to chambers a copy of the protective order that shows, in redline, the differences between the *NuStar* protective order and that proposed here.

5. The parties agree that having a substantively identical protective order in both *NuStar* and this case promotes efficiency, as it will facilitate documents and information produced or discovery taken in either case being treated as having been produced or taken in the other case, with the parties and counsel bound by common confidentiality obligations regardless.

6. That said, the parties are discussing what materials may be appropriately filed under seal in these cases, regardless of the confidentiality designations a party has assigned to the documents or information. This may result in either or both parties seeking to clarify or modify the protective orders in both *NuStar* and this case. The parties join in this motion without prejudice to their right to seek such further relief.

7. Pursuant to Local Rule 7(k), the parties have conferred in good faith and consent to, and join together in, this motion.

8. The parties respectfully request that the Court issue an Order adopting and entering the attached Proposed Protective Order, such that the parties and the Court can enforce its terms as necessary.

WHEREFORE, the parties respectfully request that the Court issue an Order adopting and entering the Stipulated Protective Order attached to this Motion as Exhibit A.

Dated: January 25, 2022

Respectfully Submitted,

Devin G. Nunes,

**Ryan Lizza and Hearst Magazine Media,
Inc., Defendants**

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Certificate of Service

The undersigned certifies that a true copy of **Joint Unresisted Motion for Entry of Protective Order** was served upon the following parties through the Court's CM/ECF electronic filing system on January 25, 2022.

/s/ Nathaniel S. Boyer

Copy to:

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